

Federal Defenders OF NEW YORK, INC.

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May 27, 2022

BY ECF & E-MAIL

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Herbert Bullock*, 21-cr-112-1 (NSR)

Dear Honorable Judge Román:

I write to request an adjournment of Mr. Bullock's sentencing currently scheduled for June 14, 2022, at 10:00 a.m. to September 22, 2022, at 3:30 p.m.

As the Court is aware, Mr. Bullock's prior counsel, Jason Ser, has left the Federal Defender's Office last month. His replacement, Rachel Martin, who will be taking over this case, does not start until June 6, 2022. Although Ms. Martin's start date is prior to Mr. Bullock's sentencing, it is after any defense sentencing submission would be due. In addition, Ms. Martin will require time to review the file, meet with Mr. Bullock, and prepare a sentencing submission on his behalf. Therefore, I am respectfully requesting the case be adjourned to September so that Ms. Martin can adequately prepare for sentencing.

I have discussed this request with Assistant United States Attorney Michael Maimin, who does not object to this request. It is my understanding that the Court has availability to hear this sentencing on September 22, 2022, at 3:30 p.m. Therefore, Mr. Bullock respectfully requests his sentencing be adjourned to that date.

Sincerely,



Elizabeth K. Quinn
Assistant Federal Defender

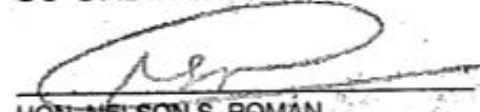
cc: Michael Maimin, AUSA

USDC SDNY
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DOC #: _____
DATE FILED: 5/31/2022

Def't's request to adjourn the in-person Sentencing from June 14, 2022 until Sept. 22, 2022 at 3:30 pm is GRANTED without objection by the Gov't. Clerk of Court is requested to terminate the motion at ECF No. 26.

Dated: White Plains, NY
May 31, 2022

SO ORDERED:


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE